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MEGAN WHITE, JERONIMO AGUILAR,
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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION**

MEGAN WHITE, JERONIMO AGUILAR,
LOREN WAYNE KIDD, LYRIC NASH,
NICOLLETTE JONES, and ODETTE ZAPATA,

Plaintiffs,

v.

SACRAMENTO POLICE DEPARTMENT; THE
CITY OF SACRAMENTO; DANIEL HAHN;
and DOES 1-200 (the names and numbers of
which are currently unknown),

Defendants.

) Case No. 2:21-cv-02211-JAM-DB

) **JOINT STIPULATION AND**
) **APPLICATION FOR AMENDMENT OF**
) **THE PRETRIAL SCHEDULING ORDER**
) **TO ALLOW A LIMITED EXTENSION OF**
) **THE DISCOVERY DEADLINES**

1 Pursuant to Fed. R. Civ. P. 6(b)(1) and Civil Local Rules 144(a), Plaintiffs Megan White,
2 Jeronimo Aguilar, Loren Wayne Kidd, Lyric Nash, Nicollette Jones, and Odette Zapata
3 (“plaintiffs”) and Defendants the City of Sacramento, the Sacramento Police Department, and
4 Daniel Hahn (“defendants”), collectively “the parties”, by and through their respective counsel of
5 record, hereby stipulate as follows:
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7 WHEREAS, on August 10, 2022, the Court issued a Pretrial Scheduling Order (“Order”)
8 (Dkt. No. 34);

9 WHEREAS, the Order provided that all expert witness disclosures shall be completed by
10 July 3, 2023, that any rebuttal experts shall be disclosed by August 11, 2023, and that fact
11 discovery shall be completed by September 29, 2023;

12 WHEREAS, plaintiffs and defendants have not filed any prior stipulations or requests to
13 extend the discovery and expert witness disclosure deadlines provided for by the Pretrial
14 Scheduling Order;

15 WHEREAS, plaintiffs noticed the deposition of the City of Sacramento pursuant to Rule
16 30(b)(6) on December 27, 2022, including various topics of inquiry requiring the preparation and
17 presentation of various different individual deponents;

18 WHEREAS, following several months of meeting and conferring, the parties reached
19 agreement on the scope of the examination of the witnesses and the appropriate witnesses for
20 30(b)(6) deposition topics, allowing plaintiffs to schedule various depositions for June 2023;

21 WHEREAS, defendants have substituted new counsel in this case just weeks ago, resulting
22 in the cancellation of the majority of the scheduled depositions;

23 WHEREAS, the parties will require fact discovery to be completed before their experts can
24 opine on relevant subjects;

25 WHEREAS, the parties are still interested in pursuing meaningful settlement discussions
26 and believe that extending the discovery deadlines will promote those efforts;

27 WHEREAS, this joint request is being made in the interests of judicial economy and in good
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1 faith and will not prejudice any party;

2 WHEREAS this stipulated extension will not change the current motion hearing schedule,
3 or pre-trial conference or trial dates;

4 WHEREAS the parties have shown good cause for the stipulated extensions to fact and
5 expert discovery pursuant to Fed. R. Civ. P. 16(b)(4), in light of the parties' diligent efforts on
6 discovery to date, in light of recent counsel changes necessitating cancellation of scheduled
7 depositions, and in light of the parties' desire to participate in meaningful settlement discussions
8 over the coming months.

9 NOW THEREFORE, plaintiffs and defendants hereby stipulate, subject to the approval of
10 this Court for good cause shown, that:

11 1. The deadline for parties' completion of discovery shall be extended to December 1,
12 2023.

13 2. The deadline for parties' disclosure of expert witnesses shall be extended to
14 December 15, 2023.

15 3. The deadline for parties' disclosure of rebuttal experts shall be extended to January
16 19, 2024.

17 4. All other deadlines established in the August 10, 2022 Pretrial Scheduling Order
18 (Dkt. No. 34) remain unchanged.
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20

21 Respectfully submitted,

22 Dated: June 16, 2023

SIEGEL, YEE, BRUNNER & MEHTA

23 /s/ Dan Siegel

24 DAN SIEGEL

25 *Attorneys for Plaintiffs*

26 MEGAN WHITE, JERONIMO AGUILAR, LOREN
27 WAYNE KIDD, LYRIC NASH, NICOLLETTE
28 JONES, and ODETTE ZAPATA

1
2 Dated: June 16, 2023

SACRAMENTO CITY ATTORNEY

3 /s/ Sean D. Richmond
4 SEAN D. RICHMOND

5 *Attorneys for Defendants*
6 SACRAMENTO POLICE DEPARTMENT; THE
7 CITY OF SACRAMENTO; DANIEL HAHN
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ORDER MODIFYING PRETRIAL SCHEDULING ORDER

Based on the stipulation of the parties and good cause appearing, the Pretrial Scheduling Order, is **MODIFIED** as follows:

(1) The deadline for parties' completion of discovery shall be extended to **December 1, 2023.**

(2) The deadline for parties' disclosure of expert witnesses shall be extended to **December 15, 2023.**

(3) The deadline for parties' disclosure of rebuttal experts shall be extended to **January 19, 2024.**

(4) All other deadlines established in the August 10, 2022 Pretrial Scheduling Order (Dkt. No. 34) remain unchanged.

(5) Counsel shall contact Judge Mendez' Courtroom Deputy, M York, via e-mail at myork@caed.uscourts.gov, prior to filing a stipulation and proposed order to continue the dates set forth in this order.

IT IS SO ORDERED.

Dated: June 20, 2023

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE